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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

AHMED HIGAZI, on behalf of himself and  
others similarly situated,

Plaintiff,

v.

CADENCE DESIGN SYSTEMS, INC.,

Defendant.

Case No. 07-2813 JW

**STIPULATION AND [PROPOSED]  
ORDER GRANTING  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER CASES  
SHOULD BE RELATED**

MICHAEL P. O'CONNOR, TIMOTHY C.  
WHALEY, MARIO ESPINOZA-ALVAREZ,  
TSAICHAUN KAO, TRI H. DAO, PETER  
T. EDWARDS, and RON SMITH

Plaintiffs,

v.

CADENCE DESIGN SYSTEMS, INC.,

Defendant

Case No. 08-3513 HRL

**STIPULATION**

Plaintiffs Michael P. O'Connor, Timothy C. Whaley, Mario Espinoza-Alvarez, Tsaichuan Kao, Tri H. Dao, Peter T. Edwards, and Ron Smith, who are plaintiffs in *O'Connor v. Cadence Design Systems, Inc.*, Case No. 08-3513 HRL ("*O'Connor*") ("Plaintiffs") and Cadence Design Systems, Inc. ("Cadence") (collectively, "the parties"), acting through their respective attorneys of record, stipulate as follows:

1. The parties recently reached a class-action settlement of approximately \$7.7 million on behalf of 207 Cadence employees in *Higazi v. Cadence Design Systems, Inc.*, Case No. 07-2813 JW. Judge Ware granted final approval of that settlement on July 7, 2008.

2. Separately, another 7 Cadence employees approached Plaintiffs' counsel in *Higazi* seeking representation on closely similar claims, and thereafter filed the *O'Connor* action.

3. After arms-length and good-faith negotiations, the parties have reached a settlement of the claims asserted in *O'Connor* that is based on and substantially similar to the *Higazi* settlement. However, the *O'Connor* case is an individual case, not a class action. The parties are currently finalizing the language of this settlement agreement.

4. The parties hope to present the settlement agreement in *O'Connor* to the Court this Friday, July 25, 2008, for approval pursuant to the Fair Labor Standards Act.

5. The terms of the settlement provide for the settlement to be effective only if the Court enters judgment approving the settlement by Friday, August 15, 2008. Thus, if the settlement is not reached by August 15, 2008, the *O'Connor* plaintiffs receive no relief, and Cadence receives no peace as to these claims.

6. The parties have filed a Joint Administrative Motion To Consider Whether Cases Should Be Related (hereinafter "Joint Administrative Motion"), pursuant to Civil Local Rule 3-12. The parties request that the *O'Connor* case be deemed related to the instant case ("*Higazi*") and reassigned to the undersigned.

7. Relation of *O'Connor* to *Higazi* will facilitate effectuation of the settlement of *O'Connor*.

SO STIPULATED.

Dated: July 23, 2008

By: /s/ Jahan C. Sagafi  
Jahan C. Sagafi

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Dated: July 23, 2008

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~~PROPOSED~~ ORDER

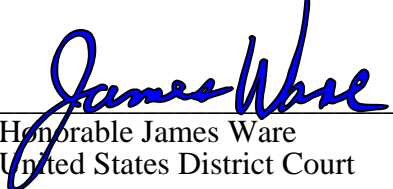
Pursuant to the parties' stipulation, and good cause appearing, the Court hereby GRANTS the Joint Administrative Motion.

IT IS ORDERED that the following cases are related:

- (1) *Higazi v. Cadence Design Systems, Inc.*, Case No. 07-2813 JW, and
- (2) *O'Connor v. Cadence Design Systems, Inc.*, Case No. 08-3513 HRL.

IT IS ORDERED that the *O'Connor* case is reassigned to the undersigned.

**It is so ORDERED.**

  
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Honorable James Ware  
United States District Court